

# Exhibit 16

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

Hearing Date: July 30,  
2014  
Hearing Time: 10:00A.M  
**RESPONSE TO OBJECTION  
TO CLAIM NO. 392**

In Re:

RESIDENTIAL CAPITAL, LLC, et al.

Debtors

Case No.: 12-12020

(Chapter 11)

Assigned to:  
Hon. Martin Glenn  
Bankruptcy Judge

**DECLARATION OF ERNEST MATTHEWS IN RESPONSE AND  
OPPOSITION TO THE OBJECTION TO RESCAP  
BORROWER CLAIMS TRUST TO  
CLAIM NUMBER 392**

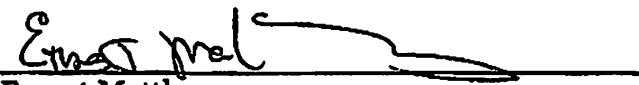
I, Ernest Matthews, declare as follows:

1. I am the father of Kevin J. Matthews who is the creditor in this action subject to Claim Number 392 in this estate and I have personal knowledge of the factual allegations attested to herein.
2. If the Court wished or required me to provide further testimony on the matters discussed, I am ready, willing and able to provide such testimony at a convenient time and place.
3. I am a licensed real estate salesperson in the State of Maryland (Reg. No. 79230).
4. Kevin is the owner of the real property located in the City of Baltimore known as 3216 East Northern Parkway, Baltimore, Maryland (21214).
5. Previously Kevin served in the U.S. National Guard and was deployed to Iraq in support of Operation Iraqi Freedom from August 2005 through

September 2006. Previously Kevin served in the United States Air Force from August 15, 1998 to December 17, 2001.

6. Kevin acquired the 3216 East Northern Parkway property as his personal home on February 14, 2008.
7. Before April 2010, my general observations of Kevin were that he was an easy going young adult who accepted responsibility and worked hard to complete his responsibilities.
8. However since April 2010 and his situation with GMAC, I observed significant changes in Kevin. He has become severely irritable, reclusive, withdrawn, and frustrated with matters he normally was not concerned with prior to April 2010.
9. Since April 2010 I have also observed that Kevin has become less social and sulks frequently, avoids his friends and family, and has suffered adverse stress in his former marriage.

I declare under penalty of perjury that the foregoing is true and correct. Executed  
on June 26<sup>th</sup>, 2014.

  
Ernest Matthews